

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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John Doe,
Plaintiff,

25 CV 3770

-vs-

Housing Solutions d/b/a Bronx Parent Network, et al.,
Defendants.

MOTION TO PROCEED UNDER A PSEUDONYM AND FOR PROTECTIVE ORDER

Plaintiff John Doe respectfully moves this Court for leave to proceed under a pseudonym and for the entry of a protective order limiting disclosure of Plaintiff's identity in public filings. In support of this motion, Plaintiff states as follows:

1. Plaintiff is a qualified person with a disability under the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, and other federal and state anti-discrimination statutes, as Plaintiff is diagnosed as HIV-positive.
2. Plaintiff's health status is highly sensitive, confidential, and stigmatized, and public disclosure of Plaintiff's identity in connection with this litigation would pose a significant risk of irreparable harm, including social stigma, discrimination, harassment, and exacerbation of Plaintiff's medical and mental health conditions.
3. Courts routinely permit pseudonymous litigation where disclosure of a party's identity would risk significant harm or implicate privacy rights of constitutional dimension. See *Sealed Plaintiff v. Sealed Defendant*, #1:537 F.3d 185, 190 (2d Cir. 2008); *Doe v. Frank*, 951 F.2d 320, 322 (11th Cir. 1992).

and transportation stipends. I have no savings or checking accounts with balances sufficient to cover court fees.

5. I have no real estate, stocks, bonds, or other valuable assets. I possess only personal clothing, minimal personal effects, and the basic property assigned to me under shelter rules.

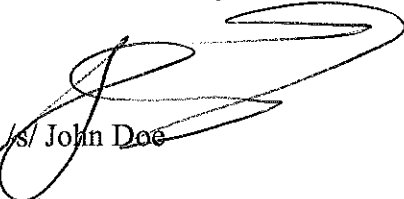
6. I have no dependents and no regular sources of income. My financial status is precarious, and I struggle to meet daily living needs such as food, transportation, and medication.

7. I believe that the facts stated in my complaint present meritorious claims of constitutional, statutory, and civil rights violations and I wish to pursue these claims but cannot afford the required court costs.

I understand that a false statement or answer to any question in this affidavit may result in dismissal of my case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 02, 2025


/s/ John Doe
John Doe

Email: johndoeusdc@gmail.com